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56cIn the United States District Court  
For the Northern District of Alabama

FILED

2016 MAY 17 A 10:55

U.S. DISTRICT COURT  
N.D. OF ALABAMAChristopher Jordan Jackson

CV-16-K-0815-S

(Enter above the full name(s) of the  
plaintiff(s) in this action)v  
Akeem D. Edmonds, Correctional Officer  
Codero Melton, Correctional Officer  
John Doe Baldwin, Captain  
Leon Bolling Warden III(Enter above full name(s) of the  
defendant(s) in this action)Corizon Healthcare

## Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes ( ) No ( 4 )
- B. If your answer to A. is "yes", describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

## 2. Court (if Federal Court, name the district; if State Court, name the county)

\_\_\_\_\_

## 3. Docket Number \_\_\_\_\_

## 4. Name of judge to whom case was assigned \_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

6. Approximate date of filing lawsuit \_\_\_\_\_

7. Approximate date of disposition \_\_\_\_\_

II. Place of present confinement William E. Donaldson Correctional Facility

A. Is there a prisoner grievance procedure in this institution?

Yes ( ) No (4)

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ( ) No ( )

C. If your answer is YES:

1. What steps did you take? Administrative Complaint to  
Warden Bolling

2. What was the result? No Response

D. If your answer is NO, explain why not? \_\_\_\_\_

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

III. Parties

In item A below, place your name(s) in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of plaintiff(s) Christopher Jackson  
100 Warrior Lane, Bessemer AL 35023

Address 100 Warrior Lane, Bessemer AL 35023

In item B. below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the names, positions, and places of employment of any additional defendants.

B. Defendant Akeem D. Edmonds,  
is employed as Correctional Officer

at William E. Donaldson, 100 Warrior Lane Bessemer AL 35023

C. Additional Defendants Codero Melton, employed at  
Bibb County Correctional Facility.  
Warden Bolling and Captain Baldwin both employed  
at William E. Donaldson Correctional Facility,  
100 Warrior Lane, Bessemer AL 35023.

IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include, also, the names of other persons involved, dates and places. *Do not give any legal arguments or cite any cases or statutes.* If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet, if necessary.

Officer Edmonds and Officer Melton beat me  
severely while Captain Baldwin stood idly  
by and watch the brutal Attack. Warden  
Bolling failed to investigate the incident or  
discipline the officers involved.

Corizon Medical Staff refused to properly  
treat my injuries.

See Attached Complaint

V. RELIEF

State briefly *exactly* what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Award Money damages against Officer Edmonds,  
Officer Melton, ~~on~~ Captain Baldwin, and Corizon  
Medical Services. Issue a Declaratory Judgment  
against Warden Leon Bollinger

"I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 16, 2016  
(date)

Christopher Jackson

Signature(s)

U.S. DISTRICT COURT  
N.D. OF ALABAMA

Complaint  
Civil Action No.

CV-16-K-0815-S

2. The United States District Court for the Northern District of Alabama is an appropriate venue under 28 U.S.C. Section 1391 (b)(2) because it is where the events giving rise to this claim occurred.

### Plaintiff

3. Christopher Jackson is and was at all times mentioned herein a prisoner of the State of Alabama in the custody of the Alabama Department of Corrections. Jackson is currently confined at William E. Donaldson Correctional Facility in Bessemer, Alabama.

### Defendants

4. Defendant Leon Bolling is Warden III at William E. Donaldson Correctional Facility. He is legally responsible for the operation of Donaldson Correctional Facility and for the welfare of all the inmates in that prison.

5. Defendant Captain Baldwin is a Correctional Officer and "Cert Supervisor" for the Alabama Department of Corrections, who, at all times mentioned in this complaint, held the rank of Captain or was assigned to William E. Donaldson Correctional Facility.

6. Akeem D. Edmonds is a Correctional Officer for the Alabama Department of Corrections, who, at all times mentioned in this complaint, held the rank of Correctional Officer and Cert Officer and was assigned to William E. Donaldson Correction Facility.

7. Defendant Codero Melton is a Correctional Officer for the Alabama Department of Corrections, who, at all times mentioned in this complaint, held the rank of Correctional Officer and Cert Officer and was assigned to work at William E. Donaldson on the day the events giving rise to this claim occurred. However, Officer Melton is permanently stationed at Bibb County Correction Facility as an COI.

### Capacity

- 8. Officer Edmonds is being sued in his individual capacity.
- 9. Officer Melton is being sued in his individual capacity.
- 10. Captain Baldwin is being sued in his individual capacity.
- 11. Warden Bolling is being sued in his Official Capacity.
- 12. Corizon Healthcare is being sued in its Official Capacity and individual capacity.

-4-

15. Officer Edmonds ordered Jackson to undress while his cell-mate McKenzie remained in the cell on his own bed. Jackson attempted to undress in a day-area in his cell but Officer Edmonds ordered him to stand in a puddle of water while undressing.

14. Officer Edmonds began complaining about the condition of the cell and making verbal threats towards Jackson. Jackson explained to the officers that there was a water leakage coming from the bottom of the toilet area and there was nothing he could do about it.

13. On April 22, 2016, Captain Baldwin and the deaf team arrived in the 4-block unit on d-side where Jackson and his cell-mate Damien McKenzie resided. Officer Edmonds and Officer Melton entered Jackson and McKenzie's cell and noticed water on the floor and their cell in a state of disarray.

Guard Battalion;

Facts

16. While Jackson was standing naked and defenseless, Officer Edmonds told Jackson he should have cleaned his cell before the cust team arrived and then punched Jackson twice in the face. Officer Edmonds then grabbed Jackson around the throat/neck area; Jackson placed his hands on officer Edmonds' chest and arm and then shoved him in an attempt to break officer Edmonds' hold around his throat/neck.

17. Officer Melton then removed his baton and struck Jackson in the chest and rib area which caused Jackson to fall down on the cell-floor. While Jackson was down on the cell-floor naked, defenseless, and not resisting; Officer Edmonds removed his baton and both officers proceeded to strike Jackson in the head, chest, ribs, arms, hands, and other areas on his upper body; while alternating from bats to boots and stomping Jackson in those same areas and stomach.

18. The beating became so severe that Jackson defecated on the floor. Jackson heard Captain Baldwin say "that's enough and that's when both officers ended their brutal assault on Jackson. Testimony from eye-witness, Damien McKenzie, during Jackson's reclassification hearing revealed that Captain Baldwin stood idly by and witness both officers beat Jackson for around 30 seconds.

## Corizon Medical Staff

### INFIrmARY:

19. Jackson was escorted to the infirmary on numerous occasions behind this incident. Jackson sustained Multiple injuries, which were as follows:

- (1). Multiple Head Injuries/Head Bust Wide Open in different Areas Required (16) staples to the head to close open head wounds
- (2). Left hand broken / Fractured.
- (3). Swelling / Abrasions / severe pain to chest and Ribs area.
- (4). Swelling / Abrasions / severe pain to Left and Right arms.
- (5). Sharp and Burning Pains to the abdominal area.
- (6). Abrasions to back and severe back pains.
- (7). Severe and excruciating headaches.
- (8). Coughing up blood and shortness of breath.

20. Dr. Roddam is around 80 years of age. He applied (16) staples to Jackson's head and left some of the head wounds open to close on their own. He also applied the staples to Jackson's head without shaving the hair around the head wounds, for sanitary purposes and to prevent infection.

21. The Corizon Medical staff refused to admit Jackson to the infirmary for observation nor recommend that he be seen immediately by outside Medical care for the Life threaten wounds he sustained to the head and his broken left hand. Jackson was also experiencing shortness of breath and severe pain to the chest and Ribs along with other injuries. Which he informed Dr. Roddam during the first examination.

22. When Dr. Roddam finished applying the staples to Jackson head, he was immediately escorted to the segregation unit. Since then, Jackson has submitted numerous sickcall slips about the excruciating headaches he been experiencing as well as the rib pain, back pain, and his broken/fractured left hand. Jackson was rushed to the infirmary by wheelchair because he was coughing up blood and experiencing a shortness of breath. Dr. Roddam prescribed Jackson Tyenol and Ibuprofen for all of his injuries and pain.

23. Jackson's left hand was X-rayed in May of 2016. The results came back and revealed that Jackson's hand is broken/fractured. Jackson's hand has been in this condition since April 22, 2016. Jackson's hand remains in this condition at the filing of this civil action.

24. Around May 4, 2016, Nurse Green Removed the staples from Jackson's head and that's when Nurse Green discovered the remaining open head wound which he sealed close with glue. Although he accidentally left two staples in Jackson's head.

### Failure to Investigate and Massive Cover-up

25. The Doc officials Refused Jackson Request to take photos of all his injuries beside his head wounds; before placing him in the Segregation Unit.

26. Jackson's Request to make a written assault incident Report statement was Refused by Doc officials.

27. Warden Bolling Refused to investigate the incident nor have he spoken with Jackson about the incident. Jackson Filed an administrative complaint to Warden Bolling on April 25, 2016. Jackson also notified II Warden Mixee verbally during institutional seg board day on April 27, 2016. No Response back.

28. On April 27, 2016, Jackson used the wall phone in the infirmary and Reported the incident to the physical abuse department. No Response.

29. On May 6, 2016, Jackson filed a complaint to the Federal Bureau Investigations in Birmingham and the Department of Justice. No Response.

30. Jackson was falsely charged with two disciplinaries on June after being placed in the Segregation Unit. Which were as follows: Failure to obey and Assault on officer. See [Exhibit A and B]

Legal Claims:

Count 1.  
Guard Brutality/Excessive Force

31. Plaintiff Jackson Realleges 1-30 and avers that the brutal beating he was subjected to by officer Melton and Officer Edmonds, violated his rights and constituted cruel and unusual punishment under the Eighth Amendment of the United States Constitution.

Additionally, Captain Baldwin is too be held liable under the superior liability standard. He may not have actively participated in the beating, but he stood idly by and witness his officers beat Jackson for 30 seconds. Captain Baldwin was the Supervisor over the cert team on the day in question and was responsible for their behavior. Jackson will forever bear the scars on his head from the head wounds, All because of Captain Baldwin's inadequate supervision.

Count 2

Corizon/Deliberate Indifference

32. Plaintiff Realleges 1-30, Count 1, and avers that the Corizon Medical Staff has been aware of the fact that Jackson's left hand has been broken/fractured since April 22, 2016. Yet, Corizon Medical Staff Refused to properly treat Jackson's hand by surgery or Recommend Outside Medical Care or Recommend a specialist. Since the incident, Jackson has been experiencing excruciating headaches, Rib pains, back pains, and sharp/burning abdominal pains. Jackson has submitted numerous sickcall slips and notified Corizon staff that the Tyenol or Ibuprofen is not helping and is only making him nauseated. Jackson has started vomited the pain pills.

The Corizon Medical Staff is deliberate indifferent to Plaintiff Jackson Medical needs which violates his Eighth Amendment Right under the United States Constitution.

33. The Plaintiff has no plain, adequate, or complete remedy at law to Redress the wrongs described herein. Plaintiff has been irreparably injured by the conduct of the defendants.

Prayer For Relief

34. Wherefore, Plaintiff Jackson respectfully prays that this Court enter Judgment granting Plaintiff the following:

- (1). A declaratory judgment declaring that Warden Bollt or any person who holds said title of Warden III, conduct his own personal investigation in all matters involving physical contact between an officer and inmate.
- (2). A declaratory judgment declaring that any person who holds said title of Warden II, shall preside over all disciplinary hearings as the "Hearing Officer" in all incidents and matters involving an inmate charged with "Assault on Officer".
3. Compensatory damages in the amount of \$500,000.00 jointly, against all defendants who work as Correctional Officers and being sued in their individual capacity, which are as follows:
  1. Officer Edmonds
  2. Officer C. Melton
  3. Officer/Captain Bald.

4. Punitive damages in the amount of \$150,000. against officer Edmonds.
5. Punitive damages in the amount of \$150,000. against officer Melton.
6. Punitive damages in the amount of \$200,000. against Captain Baldwin.
7. Compensatory damages in the amount of \$150,000. against Corizon.
8. Punitive Damages in the amount of \$100,000. against Corizon.
9. A Jury trial on all issues triable by Jury.
10. Plaintiff's costs in this suit.
11. Any Additional Relief this Court deems just, proper, and equitable.

Dated Christopher Jackson  
Respectfully Submitted

Verification

I have Read the Foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those, I believe them to be true. I certify, under penalty of perjury that the foregoing is true and correct.

Executed at William E. Donaldson Correctional Facility,  
100 Warrior Lane, Bessemer, AL 35023.

Date: May 16, 2016.

Signature  
Christopher Jackson  
Christopher Jackson

## Alabama Department of Corrections

DISC004

## DISCIPLINARY REPORT

403A Warden Decision

Exhibit A

Incident Report Number: WDCF-16-00825

1. Inmate: JACKSON, CHRISTOPHER

Custody: MEDIUM

W-22

AIS: 00201043X

2. Institution: WILLIAM E. DONALDSON CORR. FAC

Disc #: WDCF-16-00825-2

3. The above inmate is being charged by: EDMONDS, AKEEM D  
with a violation of the following Rule(s):

925 - Failure to obey a direct order of an ADOC Employee

From Administrative Regulation #403, which occurred on or about:

Apr 22 2016 9:55AM at D Block cell 22

A hearing on this charge will be held after 24 hours from being served.

4. Circumstances of the violation(s) are as follows:

On April 22, 2016 at approximately 9:55am, You Inmate Jackson failed to comply with an order given by Officer Edmonds to submit to a search of your person and cell.

04/22/2016

Date

EDMONDS, AKEEM D / Officer

Arresting Officer Name / Title

5. I hereby certify that on this 22nd day of April, 2016, at (time) 13:15:00, I have personally served a copy of the foregoing upon the above named inmate and I have informed the inmate of his/her right to present oral or written statement at the hearing and to present written questions for the witnesses.

ROBINSON, BRIAN A

Serving Officer Name / Title

See Signed 403A (1-4)

Inmate's Signature / AIS Number

6. Witnesses desired?

NO: See Signed 403A (1-4)

YES:

Inmate's Signature

Inmate's Signature

7. If yes, list: N/A

8. Hearing Date: May 2, 2016

Time: 13:25:00

Place: West Classification

9. Inmate must be present in Hearing Room. If he / she is not present, explain in detail on additional page and attach.

10. The Arresting Official, Inmate, and all Witnesses were sworn to tell the truth.

BRADFORD, WILLIAM K

Hearing Officer Name / Title

11. A finding is made that the inmate is capable of representing himself / herself.

BRADFORD, WILLIAM K

Hearing Officer Name / Title

12. Plea: JACKSON, CHRISTOPHER / 00201043X

Not Guilty

13. Arresting Official's testimony (at the hearing):

During a shake down of his cell inmate Jackson tossed his wet socks toward my face.

QBHO to Officer Edmonds

Did inmate Jackson follow all orders up to a certain point.

14. Inmate's testimony:

## Alabama Department of Corrections

DISC004

## DISCIPLINARY REPORT CONTINUATION WDCF-16-00825-2

## 403A Warden Decision

I did comply with Officer Edmonds order.

See attached written statement by inmate Jackson and questions to witness from inmate Jackson.

15. The inmate was allowed to submit question(s) to all witnesses. Copy of questions and answers are attached.

BRADFORD, WILLIAM K

Hearing Officer Name / Title

16. The following witnesses were not called:

N/A

17. After hearing all of the testimony, the Hearing Officer makes the following findings of fact (Be Specific):

The hearing Officer finds that:

The hearing officer finds inmate Jackson not guilty of failure to obey a direct order of an ADOC Employee.

18. Basis for finding of fact:

Beased on the testimony of the arresting officer, the charged inmate, and of inmate Jackson's witness; the Hearing Officer finds that inmate Jackson complied with the orders given by Officer Edmonds up until inmate Jackson assaulted Officer Edmonds by throwing wet socks toward the officers face.

19. Hearing Officer's decision: ☐ Guilty ☒ Not Guilty ☐ Recommend for reinitiation

20. Hearing Officer's recommendation of sanction(s) to be taken against this inmate:

☐ Counseling / Warning

☐ Extra Duty for \_\_\_\_ days at \_\_\_\_ hours per day under supervision \_\_\_\_ Shift

☐ Loss of Outside privileges for \_\_\_\_ days

**Community Based Institutions Only:**

☐ Loss of Canteen privileges for \_\_\_\_ days

☐ Draw cut to \_\_ (min \$25) for \_\_ days

☐ Loss of Telephone privileges for \_\_\_\_ days

☐ Restriction / State Whites for \_\_\_\_ days

☐ Loss of Visiting privileges for \_\_\_\_ days

☐ Loss of Passes for \_\_\_\_ days

☐ Removal from Hobby Craft

☐ Return to Inmate Staff for \_\_\_\_ days

☐ Loss of Good Time \_\_\_\_ Yrs \_\_\_\_ Mos \_\_\_\_ Dys

☐ Disciplinary Seg for \_\_\_\_ days

☐ Recommend Custody Review

☐ Recommend Job Change

☐ Financial Compensation \_\_\_\_

BRADFORD, WILLIAM K

Hearing Officer Name / Title

21. Warden's Action - Date: 05/06/2016

Approved Leon Bolling

Disapproved \_\_\_\_\_

Alabama Department of Corrections

DISC004

DISCIPLINARY REPORT CONTINUATION WDCF-16-00825-2

403A Warden Decision

Other (specify) \_\_\_\_\_

22. I hereby certify that a completed copy of the foregoing Disciplinary Report was served on the above named Inmate on this the 7<sup>th</sup> day of May, 20 16 at (time) 10:38 (am) pm ).

23. R. Gordon  
Serving Officer Name / Title

\_\_\_\_\_  
Inmate's Signature / AIS Number

Distribution: Original to Central Records Division  
Copy to: I & I (If Federal or State law violated)  
Inmate Institutional File  
Board of Pardons and Parole  
Sentencing Judge (if applicable)

## Alabama Department of Corrections

DISC004

## DISCIPLINARY REPORT

403A Warden Decision

Exhibit B

Incident Report Number: WDCF-16-00825

1. Inmate: JACKSON, CHRISTOPHER

Custody: MEDIUM

AIS: 00201043X

2. Institution: WILLIAM E. DONALDSON CORR. FAC

1/1/22

Disc #: WDCF-16-00825-1

3. The above inmate is being charged by: EDMONDS, AKEEM D

with a violation of the following Rule(s):

902 - Assault on a Person(s) associated with ADOC

From Administrative Regulation #403, which occurred on or about:

Apr 22 2016 9:55AM at D Block cell 22

A hearing on this charge will be held after 24 hours from being served.

4. Circumstances of the violation(s) are as follows:

On April 22, 2016 at approximately 9:55am, You Inmate Jackson did assault Officer Edmond by striking in the chest and arm, during an attempted search of your cell.

04/22/2016

Date

EDMONDS, AKEEM D / Officer

Arresting Officer Name / Title

5. I hereby certify that on this 22nd day of April, 2016, at (time) 13:15:00, I have personally served a copy of the foregoing upon the above named inmate and I have informed the inmate of his/her right to present oral or written statement at the hearing and to present written questions for the witnesses.

ROBINSON, BRIAN A

Serving Officer Name / Title

Inmate Refused to Sign

Inmate's Signature / AIS Number

6. Witnesses desired?

NO: Inmate Refused to Sign

YES:

Inmate's Signature

Inmate's Signature

7. If yes, list: N/A

8. Hearing Date: May 2, 2016

Time: 15:42:00

Place: West Classification

9. Inmate must be present in Hearing Room. If he / she is not present, explain in detail on additional page and attach.

10. The Arresting Official, Inmate, and all Witnesses were sworn to tell the truth.

BRADFORD, WILLIAM K

Hearing Officer Name / Title

11. A finding is made that the inmate is capable of representing himself / herself.

BRADFORD, WILLIAM K

Hearing Officer Name / Title

12. Plea: JACKSON, CHRISTOPHER / 00201043X

Not Guilty

13. Arresting Official's testimony (at the hearing):

Inmate Jackson did strike me while I was trying to stop inmate Jackson from flushing something down the toilet during a shakedown. Inmate Jackson stated "I live for this shit."

14. Inmate's testimony:

## Alabama Department of Corrections

DISC004

## DISCIPLINARY REPORT CONTINUATION WDCF-16-00825-1

## 403A Warden Decision

## SEE ATTACHED WRITTEN STATEMENT

Officer Edmonds and another Officer on the CERT team entered my cell and ordered me to strip naked. While I was naked, Officer Edmonds punched me in the face for no reason then him and the other Officer tried to murder me. I received 16 (sixteen) staples in my head, chest, and rib injuries along with my other injuries.

SEE ATTACHED STATEMENT FROM INMATE DAMIEN MCKENZIE (WITNESS)

QBHO TO INMATE MCKENZIE

15. The inmate was allowed to submit question(s) to all witnesses. Copy of questions and answers are attached.

BRADFORD, WILLIAM K  
Hearing Officer Name / Title

16. The following witnesses were not called:

N/A

17. After hearing all of the testimony, the Hearing Officer makes the following findings of fact (Be Specific):

The hearing Officer finds that:

The hearing Officer finds inmate Jackson guilty.

18. Basis for finding of fact:

Based on the Arresting Officers testimony, and the witnesses statement and answer to the Hearing Officers question the hearing Officer finds that inmate Jackson did assault Officer Edmonds.

19. Hearing Officer's decision: ☒ Guilty ☐ Not Guilty ☐ Recommend for reinitiation

20. Hearing Officer's recommendation of sanction(s) to be taken against this inmate:

☐ Counseling / Warning

☐ Extra Duty for \_\_\_\_ days at \_\_\_\_ hours per day under supervision \_\_\_\_ Shift

☐ Loss of Outside privileges for \_\_\_\_ days

**Community Based Institutions Only:**

☒ Loss of Canteen privileges for 45 days, as of 05/06/2016

☐ Draw cut to \_\_ (min \$25) for \_\_ days

☒ Loss of Telephone privileges for 45 days, as of 05/06/2016

☐ Restriction / State Whites for \_\_\_\_ days

☒ Loss of Visiting privileges for 45 days, as of 05/06/2016

☐ Loss of Passes for \_\_\_\_ days

☐ Removal from Hobby Craft

☐ Return to Inmate Staff for \_\_\_\_ days

☐ Loss of Good Time \_\_\_\_ Yrs \_\_\_\_ Mos \_\_\_\_ Dys

☒ Disciplinary Seg for 45 days

☐ Recommend Custody Review

☐ Recommend Job Change

☐ Financial Compensation \_\_\_\_

BRADFORD, WILLIAM K  
Hearing Officer Name / Title

21. Warden's Action - Date: 05/06/2016

Approved Leon Bolling

Alabama Department of Corrections

DISC004

DISCIPLINARY REPORT CONTINUATION WDCF-16-00825-1

403A Warden Decision

Disapproved \_\_\_\_\_

Other (specify) \_\_\_\_\_

22. I hereby certify that a completed copy of the foregoing Disciplinary Report was served on the above named Inmate on this the 17<sup>th</sup> day of May, 20 16 at (time) 10:36 (am / pm).

23.

R. G. Badger  
Serving Officer Name / Title

\_\_\_\_\_  
Inmate's Signature / AIS Number

Distribution:

Original to Central Records Division

Copy to: I & I (If Federal or State law violated)

Inmate Institutional File

Board of Pardons and Parole

Sentencing Judge (if applicable)